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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF MARK GALICIA IN
SUPPORT OF PG&E'S MEMORANDUM
OF POINTS AND AUTHORITIES IN
OPPOSITION TO CLAIMANT'S SECOND
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

Date: December 19 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Only)

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

DECLARATION OF MARK GALICIA

I, Mark Galicia, declare as follows:

1. I am employed as a Transmission Line Standards Engineer with Pacific Gas and Electric Company (PG&E). I received a Bachelor of Science degree in Mechanical Engineering. I am a Mechanical Engineer licensed by the California Board for Professional Engineers, Land Surveyors and Geologists, License Number 31509.

2. I began working at PG&E in 2006. I have held different positions with PG&E working as an engineer on electric transmission facilities. Since April 2020 I have been employed as an Electric Standards and Strategy Senior Consultant where my duties include developing and updating the Company's standards relating to the design of electric transmission facilities.

3. I have personal knowledge of the facts set forth herein and can and do competently testify regarding the facts set forth in this declaration.

4. In 2017-2018 I was the Project Engineer on the reconstruction of the transmission poles at the San Bruno Transition Station, which is the parcel of land owned by PG&E located immediately north of the Komir Property. As Project Engineer I was responsible for the engineering and design of the reconstruction project. The project involved the reconstruction of six poles that supported six separate 115 kV circuits in the Transition Station. These poles were replaced with three new tubular steel poles within the Transition Station, with each tubular steel pole supporting two 115 kV circuits.

5. The project was designed to retain the same alignment of the electric circuits as they extended over the Komir Property and attach to a set of towers located south of the Komir Property. The alignment of the circuits over the Komir Property is depicted in the drawing attached as Exhibit 1, which is a plan view from PG&E's engineering drawings for this project. Exhibit 1 also depicts the work within the Transition Station and identifies the six existing poles that were replaced with three new tubular steel poles. I have marked Exhibit 1 to identify the six poles that were removed,

1 which are highlighted in yellow. I have also identified the three replacement tubular steel
2 poles on Exhibit 1, which are highlighted in red.

3 6. Attached as Exhibits 2 and 3 depict the construction of the new tubular
4 steel poles in the Transition Station. As shown in these images, the tubular steel poles
5 were installed between the existing transmission circuits, which retained the alignment of
6 the circuits. Exhibit 3 depicts the construction of the new tubular steel pole on the right
7 side, with the workman in the bucket working between the transmission circuits on the
8 new structure. The two pole structures appearing in the background of Exhibit 3 are the
9 original pole structures in the Transition Station. Exhibit 4 is a photograph that depicts
10 the completion of the project after the three replacement tubular steel poles have been
11 installed in the Transition Station.

12 I declare under penalty of perjury under the laws of the United States that the
13 foregoing is true and correct.

14 Executed this 1st day of November, 2023 at San Francisco, California.

15
16 By: Mark Galicia
Mark Galicia